

Osberg v. Foot Locker, Inc., et al., 07-cv-01358 (KBF) (S.D.N.Y.)

**Class's Opposition to Defendants' Motion *in Limine*
to Exclude Testimony of Christopher Maikels**

July 10, 2015

EXHIBIT A

Please type up as early as possible
Thank - Evan

WOOLWORTH CORPORATION

INTEGRATION LEVEL:

PAY CREDITS:

NORMAL COSTS:

\$22,000

\$22,000

\$22,000

\$22,000

Current Plan

SERVICE

0 - 10

1.75% / 0.75%

1.95% / 0.85%

2.00% / 1.00%

1.80% / 0.85%

11 - 20

2.25 / 1.00

2.50 / 1.10

2.75 / 1.25

2.50 / 1.10

21+

3.00 / 1.25

3.35 / 1.40

3.75 / 1.75

3.50 / 1.40

Ongoing:
First Year:

\$7,364,000

\$8,218,000

\$8,855,000

\$7,980,000

\$ 9,798,000
9,798,000

2,544,000

2,964,000

3,278,000

2,814,000

AGE	SERVICE	CURRENT PAY	AGE 65 PAY	AGE 65 ANNUITY	FINAL PAY MULTIPLE	AGE 65 ANNUITY	FINAL PAY MULTIPLE	AGE 65 ANNUITY	FINAL PAY MULTIPLE	AGE 65 ANNUITY	FINAL PAY MULTIPLE	Age 65 Annuity
35	5	20,000	64,868	6,974	1.0	7,740	1.1	8,597	1.2	7,813	1.1	16,286
30	0	\$16,000	\$63,000	\$7,243	1.1	\$8,079	1.2	\$8,928	1.3	\$8,083	1.2	
35	5	50,000	162,170	19,880	1.1	22,064	1.3	24,700	1.4	22,246	1.3	43,549
37	0	24,000	72,000	8,126	1.0	8,984	1.1	10,037	1.3	9,149	1.2	
35	5	150,000	486,570	62,939	1.2	69,855	1.3	78,428	1.5	70,403	1.3	134,426
55	25	150,000	222,000	42,404	1.8	43,572	1.8	45,285	1.9	43,935	1.8	
50	20	20,000	36,019	4,207	1.1	4,428	1.1	4,697	1.2	4,513	1.2	8,017
45	20	150,000	329,000	42,301	1.2	45,893	1.3	51,138	1.4	45,962	1.3	
50	20	50,000	90,047	12,893	1.3	13,558	1.4	14,482	1.5	13,768	1.4	23,028
40	5	150,000	400,000	41,964	1.0	46,382	1.1	51,612	1.2	45,507	1.1	
50	20	150,000	270,142	41,957	1.4	44,101	1.5	47,217	1.6	44,733	1.5	73,163

NOTE: Amortization of increased Prior Service Cost is the same for each formula.
\$600,000/year for 30 years.

April 17, 1995

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ABRox

BC: FWN

BC: FWN Y0 - 0014

X-2056 EVAN or X-2101 Chris

WOOLWORTH CORPORATION

INTEGRATION LEVEL:		\$22,000	\$22,000	\$22,000	\$22,000	Current Plan
PAY CREDITS:	SERVICE					
	0 - 10	1.75% /0.75%	1.95% /0.85%	2.00% /1.00%	1.80% /0.85%	
	11 - 20	2.25 /1.00	2.50 /1.10	2.75 /1.25	2.50 /1.10	
	21+	3.00 /1.25	3.35 /1.40	3.75 /1.75	3.50 /1.40	
NORMAL COSTS:	Ongoing:	\$7,364,000	\$8,218,000	\$8,855,000	\$7,980,000	9,798,000
	First Year:					9,798,000

AGE	SERVICE	CURRENT PAY	AGE 65 PAY	AGE 65 ANNUITY	FINAL PAY MULTIPLE	AGE 65 ANNUITY	FINAL PAY MULTIPLE	AGE 65 ANNUITY	FINAL PAY MULTIPLE	AGE 65 ANNUITY	FINAL PAY MULTIPLE	Age 65 Annuity
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April 17, 1995

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ABR Cox